

## **REMARKS**

This is in response to the Office Action dated March 2, 2005. In view of the foregoing amendments and following representations, reconsideration is respectfully requested.

Initially, the specification and abstract have been reviewed and revised in order to make a number of minor editorial changes and to place the application in the preferred format. Due to the nature of the revision involved, the changes have been presented in the form of a substitute specification and abstract. No new matter has been added. Also enclosed is a "marked-up" copy of the original specification and abstract to show the changes that have been incorporated into the substitute specification and abstract. The enclosed copy is entitled "Version with Markings to Show Changes Made."

In view of the presentation of the substitute abstract, it is submitted that the objection to the original abstract is now clearly obviated.

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To further facilitate the Examiner's reconsideration of the application, claims 1-6 have been canceled and replaced with new claims 7-18. Each of the new claims has been carefully drafted to ensure compliance with the requirements of 35 U.S.C. § 112, second paragraph. Note that each of the informalities, described by the Examiner on page 2 of the Office Action, has been corrected in the new claims.

Next, on pages 3-4 of the Office Action, claims 1-6 are rejected as being unpatentable over Jones (U.S. Patent No. 4,580,626) in view of Owens (U.S. Patent No. 4,441,742). It is submitted that the present invention, as embodied by the newly presented claims, now clearly patentably distinguishes over the Jones and Owens references for the following reasons.

The present invention is directed to a riser control device that is used in connection with spool and horizontal production trees. The present invention, as defined in independent claim 7, includes a pair of rams for isolating the well and a pair of shear blades for cutting off an intervention string. Note that independent claim 7 specifically requires that the rams and blades are radially movable and are located within the housing of the well bore or riser.

Jones discloses a blow out preventer having shear rams that are hydraulically actuated by pistons mounted on the axis of the ram. The Jones BOP is similar to the conventional arrangement described on page 4 of the specification, as originally filed. Thus, the Jones structure has the same disadvantages.

Owens discloses a connector that is provided in a pocket on an outside portion of a blow out preventer, and is not provided inside the housing of a riser as required in claim 7. Accordingly, the collective teachings of the Jones and Owens references do not disclose or suggest an arrangement in which the rams, blades and vertically disposed actuator assembly are disposed within

housing of a riser control device. Therefore, it is submitted that the present invention as defined in new claims 7-18 is now clearly allowable over the prior art of record.

In view of the above, it is submitted that the present application is now clearly in condition for allowance. The Examiner therefore is requested to pass this case to issue.

In the event that the Examiner has any comments or suggestions of a nature necessary to place this case in condition for allowance, then the Examiner is requested to contact Applicant's undersigned attorney by telephone to promptly resolve any remaining matters.

Respectfully submitted,

Per ALMDAHL et al.

By: Michael S. Huppert

Michael S. Huppert  
Registration No. 40,268  
Attorney for Applicants

MSH/kjf  
Washington, D.C. 20006-1021  
Telephone (202) 721-8200  
Facsimile (202) 721-8250  
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